

**Economic Development Alliance for Business, Bruce Kern,
Executive Director
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**ECONOMIC DEVELOPMENT
ALLIANCE FOR BUSINESS**
Building Resources, Businesses & Quality Jobs

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May 25, 2004

Mr. Thomas Grim, Document Manager,
U.S. Department of Energy/National Nuclear Security Administration
Livermore Site Office
7000 East Avenue, L-293
Livermore, CA 94550-9234

Dear Mr. Grim,

The Economic Development Alliance for Business (EDAB) is a regional economic development organization representing Alameda and Contra Costa counties, the East Bay of the San Francisco Bay region. We are a public/private organization with a membership that includes local government agencies (including eighteen cities), non-profit organizations and private sector members. We appreciate this opportunity to offer our comments on the social and economic impacts of Lawrence Livermore National Laboratory (LLNL) on our local region:

The Lab is part of the foundation of the East Bay's knowledge-based economy. East Bay headquarter companies such as Chiron, Bayer Healthcare, Bio-Rad, Berlex, UTStarcom, PeopleSoft, Sybase, Lam Research, Logitech and hundreds of smaller technology companies clearly indicate the importance of science and technology to the East Bay's economy. By some counts, the East Bay has more biotech companies than San Diego and receives more total venture capital investment than all but a few of the nation's states. Through tech transfer, cooperative research, and the spin-off of companies and personnel, LLNL is an important source of the technologies and personnel necessary for the East Bay to compete effectively in the global economy. In turn, the local region supports the Lab -- in deploying homeland security technologies, for example -- by providing other public and private sector technologies, manufacturing expertise, financing, marketing, distribution channels and other business support services that are only available in the world's most successful technology commercialization region. The Lab is an integral part of the regional science and technology infrastructure.

LLNL contributes to the speed of regional scientific discovery. The lab's participation in an exceptional regional community of research -- through the training of researchers, participation in local conferences, and collaboration with other major research institutions -- not only benefits LLNL, but has accelerated the region's, and the nation's, understanding of the human genome, nanostructures, climate and a number of other areas. The Lab's research has pushed, and been pushed by institutions such as Berkeley Lab,

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Executive Director
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1/04.01,
15.01
cont.

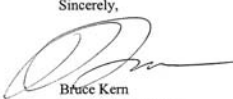
Sandia National Laboratories, UC San Francisco, Stanford, Berkeley, Stanford Linear Accelerator Center, SRI International, Palo Alto Research Center and NASA Ames to name just a few.

Lawrence Livermore National Laboratory is a social and economic driver. The Lab's 8000 employees are highly educated and are a major asset to their communities. They have organized science fairs assisted in curriculum development served as resources for local schools, and participated in many other community affairs. The lab itself has made important equipment contributions to local community colleges, hosts a local branch of UC Davis, and provides assistance to local, minority, women-owned and startup companies. The presence of the Lab and its employees has helped grow a thriving technology-based economy in the surrounding area and helped make the Tri-Valley region one of the highest educated and wealthiest in the nation.

The Lab's \$1.6 billion annual budget is of major importance to the local economy. Since the Lab's revenue comes primarily from outside the region, it is an especially important source of revenue and new regional wealth. With approximately \$660 million of the Lab's budget supporting salaries and benefits well above average, the importance of having Lab employees living in our communities to support a high quality of life is apparent. The relatively steady level of employment and wages also helped buffer the surrounding Tri-Valley area from the much more severe impacts of the 2001 recession that affected our neighbors in the South and West Bay. In addition, the Lab's local purchases have helped support a number of local companies providing scientific, technical, professional and other services.

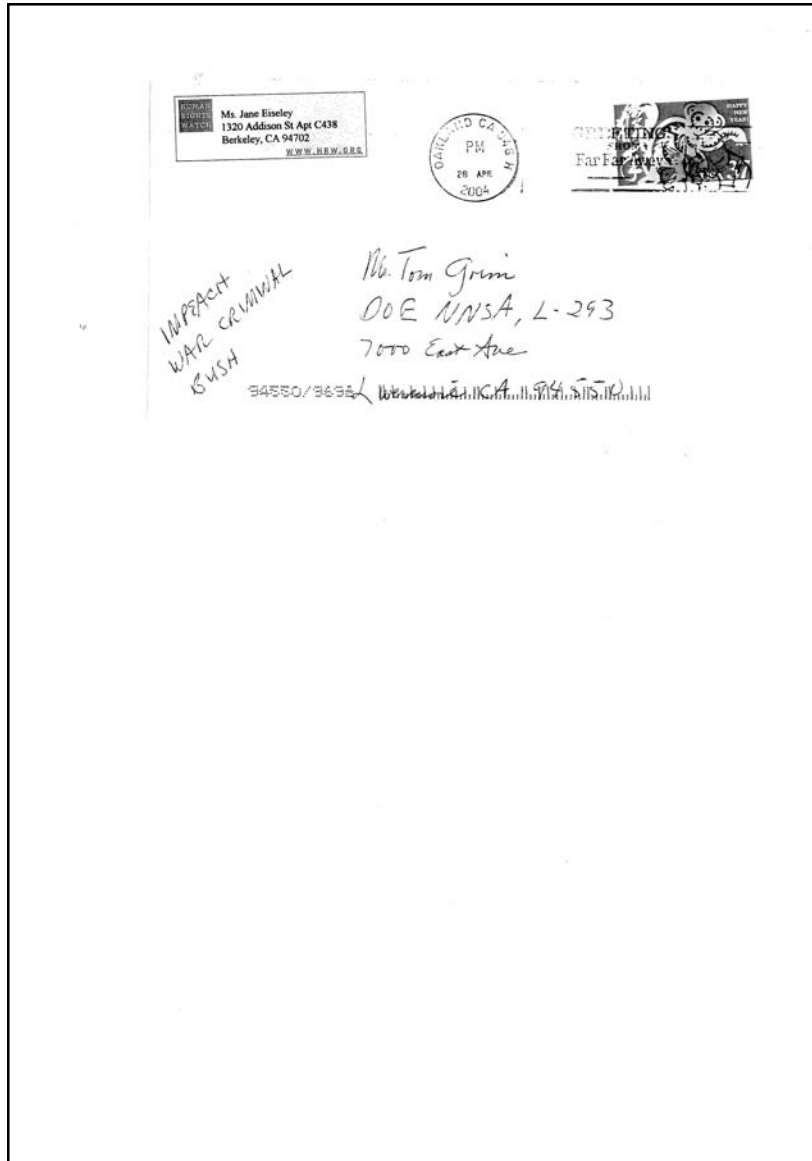
In short, LLNL provides a significant value to the region from the direct funds it brings to the economy, and the companies it creates. But it provides even greater value through the strength it brings to our neighborhoods and communities, the way it complements the activities of one of the largest research communities in the nation, the enabling technologies and vitality it brings to one of the most active commercial development centers in the world, and most of all, the contributions it makes to the security of the entire nation.

Sincerely,

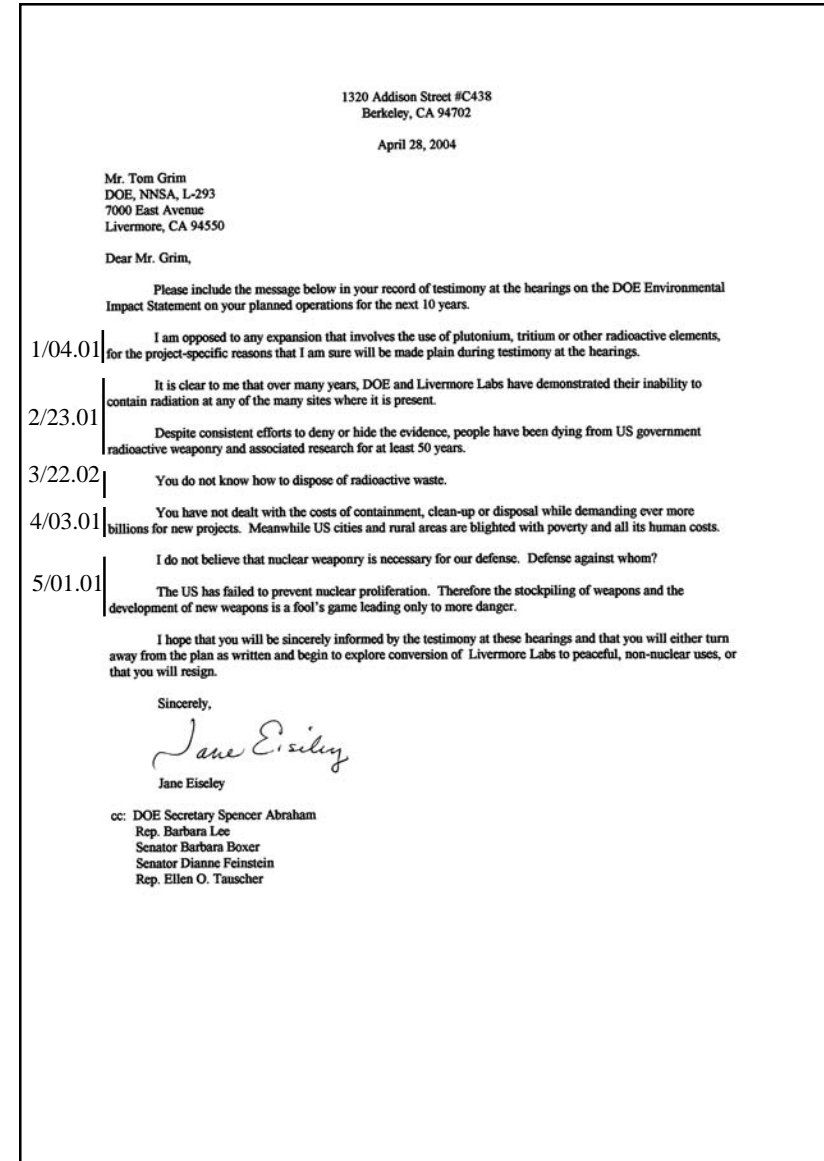


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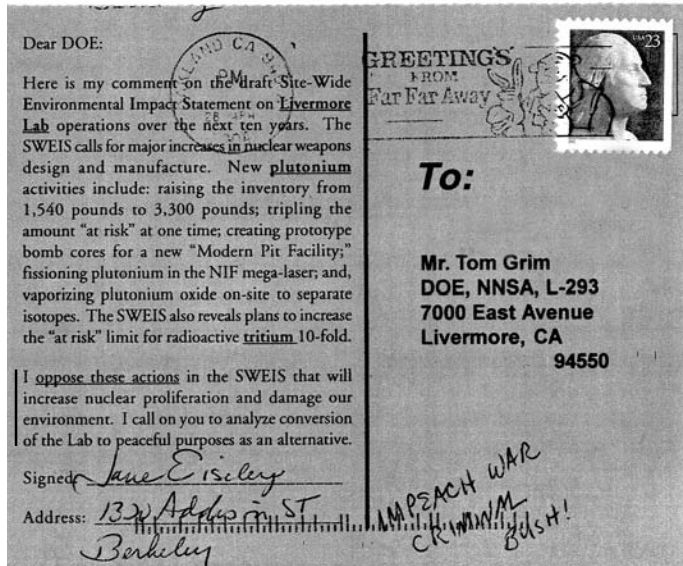
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Eiseley, Jane
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Eiseley, Jane
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Elhayek, Jalal
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Dear Mr. Grim:

- 1/23.03 I am concerned with the manner in which you state the risk of continued operations at LLNL. I assume that a probabilistic assessment was conducted. I wonder how you can state with confidence that there is no risk from radiation when the only experiments possible are those done on rats with high doses of radiation over a short period of time. According to many experts, this does not necessarily provide insight into the effects of low doses of radiation over long periods of time (Silbergeld 1991; Jasanoff 1991). It seems that you must have simply disregarded the uncertainty involved with such a complex issue, and taken what can be currently known as the only important aspect of risk assessment. I think that, considering the potentially fatal nature of the materials at LLNL, this is a foolhardy approach. Also, I have not been convinced that LLNL needs to continue its operations as you have defined them, and therefore question the acceptability any risk at all. Given the fact that we are at risk of suffering irreversible damage to the environment and human health - especially considering LLNL's lackluster history of accidents and mishandling of dangerous materials alluded to in the recent GAO report - isn't this a good opportunity to enact the Precautionary Principle at least in order to give the community at risk an chance to assess the alternatives (O'Brien 1999). I hope that you will familiarize yourself with the references I have provided and consider a different approach to risk assessment.
- 2/25.06
- 3/04.01
- 4/23.02

Thank you,

Jalal Elhayek
914 Cayuga Street
Santa Cruz, CA 95062

Sources

- Jasanoff, Sheila. "Acceptable Evidence in a Pluralistic Society." In *Acceptable Evidence* ed. Deborah G. Mayo & Rachelle D. Hollander. Oxford University Press, Inc. New York, NY. 1991.
- O'Brien, Mary. "Alternatives Assessment: Part of Operationalizing and Institutionalizing the Precautionary Principle. In *Protecting Public Health & the Environment*. ed. Carolyn Raffensperger and Joel Tickner. Island Press. Washington, DC and Covello, CA. 1999.
- Silbergeld, Ellen K. "Risk Assessment and Risk Management: An Uneasy Divorce." In *Acceptable Evidence*. ed. Deborah G. Mayo and Rachelle D. Hollander. Oxford University Press, Inc. New York, NY. 1991.

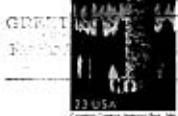
Ellis, Rob
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1/04.01

HELLO -
FIRSTLY, I THOUGHT THE COLD WAR WAS
OVER AND WE WERE REDUCING THE MENACE
OF NUCLEAR WARFARE. BUT, NOW I'M INFORM-
ED WE PLAN TO MAKE NEW PLUTONIUM PITS
(WE IN COLORADO WILL ALWAYS LIVE WITH
PAST PIT POLLUTION!!) AND START "ENHANCED
NUCLEAR TESTING"! WHEN IS ENOUGH, ENOUGH!
WE HAVE PEOPLE WITHOUT HOMES, ADEQUATE
FOOD + EDUCATION NOT TO MENTION WE
CANNOT STORE NUCLEAR MATERIAL SAFELY WHEN
IT HAS A HALF LIFE OF 240,000 YEARS!!!
PLEASE END THIS MADNESS!!

THANK YOU, ROB ELLIS 01249
RECEIVED MAY 24 2004

ROB ELLIS
1641 TWIN SISTERS RD
NEDERLAND, CO
80466



TOM GRIM DOE NNSA, L-293
7000 EAST AVE.
LIVERMORE, CA 94550



Ericson, Stephanie
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Comments public hearing on SWEIS for LLNL

April 27, 2004

Submitted by Stephanie Ericson

Every time I hear of a new weapons plan put forth by DOE and the Lab, it never fails to remind me of Walt Kelley's comic strip character Pogo of years ago and his ^{Li}surprising conclusion ~~realization~~: "We have met the enemy and it is us."

1/04.01

We, in the community of Livermore, ^{The Valley}are NOT the enemy, nor are the other peoples on our precious Earth the enemy. Yet we may all pay a price for this foolish, dangerous course of ramping up nuclear weapons work at Livermore Lab and other DOE sites and now also adding research on bio-warfare agents to the mix. ^{Why is it that so many programs pushed on national security grounds make us feel insecure + vulnerable.} Our real enemies are the goal of never-ending and ever-increasing nuclear domination and the inevitable response of other nations and groups to our hypocrisy of more nukes for us while we point fingers at WMD, real or imagined, elsewhere.

My concerns about DOE's ten-year plans for LLNL are both global and local.

2/33.01

I'm concerned about the increased amount of plutonium this plan would permit at the Lab because it increases opportunities for greater plutonium emissions into our community.

3/23.01

Since 1960 there have been at least 30 releases of plutonium, uranium and other radioactive substances at the Lab. There have been fires, spills, filter failures, leaks, and criticality accidents. In addition, plutonium-contaminated sewage has been discharged to Livermore's wastewater treatment plant, and liquids with plutonium poured onto the ground. Plutonium in unlined liquid waste pits leached into the soil, and some may have been swept into the atmosphere after evaporation. A 1996 report found that LLNL could not account for 12 pounds of plutonium, possibly due to spills, releases, and/or measurement errors.

We also know that elevated levels of plutonium have been found in Big Trees Park in Livermore, with no definitive explanation for how it got there, some theories, yes, but no real answers.

4/27.02,
33.01

It therefore seems irresponsible to let the Lab have even more plutonium, and all the more so when you consider its purpose — to introduce new nuclear weapon technologies here.

- 1) P-AVLIS (atomic vapor laser isotope separation). This was previously proposed, and later abandoned for uranium isotope separation, in part, I believe, because of environmental concerns. However, this new plan will use 220 lbs of Plutonium, ^{as in 1996}increasing air pollution and increasing the stream of transuranic waste (that's stuff like Plutonium and U) at the lab to over 20 times current levels.

Ericson, Stephanie

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5/37.01	<p>2) Plutonium pit manufacturing. Again this adds risk to the community for something that is not needed to maintain the current nuclear weapons stockpile.</p>
6/02.01	<p>These programs are also directly linked to the intent by the Bush administration to develop new nuclear weapons, such as the Robust Nuclear Earth Penetrator and the so-called mini-nukes. I guess the idea is to make them seem small enough and even cute, maybe, so it becomes thinkable to use them. Like how can a mini-nuke be THAT bad?</p>
5/37.01 cont.	<p>Eventually the DOE plans to construct somewhere a Modern Pit Facility, which would have the capability, if it ran double shifts, to each year produce 900 pits, an amount that I understand is equal to entire nuclear arsenal of China and France.</p> <p>The purpose of the Livermore pit facility is to work out the bugs of new plutonium pit manufacturing technology prior to large-scale fabrication elsewhere.</p>
7/35.01	<p>While the Lab is working these bugs out, it will become host of bugs of another sort. DOE's proposal to bring bio-warfare agent research to Livermore strikes me as especially wrong-headed. The proposed BSL-3 facility here would allow research on agents with the potential for airborne transmission that can be deadly if untreated, such as anthrax, botulism and the bubonic plague.</p>
8/25.01	<p>Not only am I concerned about the impact of potential accidents in a heavily populated area such as ours, but also about the message we would send to other nations and groups — that the U.S. chooses to do this kind of politically sensitive research in a super secret nuclear facility whose primary mission is military research.</p>
9/01.01	<p>The line between defensive and offensive research in this areas is very thin. By doing it a classified site like this erects tremendous obstacles to oversight, both domestically and internationally. Even if the Bush administration hadn't lowered U.S. credibility recently with false assertions about definitive evidence of WMD in Iraq, do we really expect that "Don't worry. Just trust us." will cut it on this? I don't think so.</p> <p>It seems to me that this is a recipe for disaster: that, as a nation, we are leading by mis-example.</p>
10/23.01 9/01.01 cont.	<p>I would ask the DOE that it more seriously consider the local health and environmental impacts of these and other new or expanded proposed programs, and, in addition, that it undertake a rigorous review of these programs' potential proliferation impacts for WMD. And I would ask that such a review include the assessments of independent experts who are not connected with DOE by employment or collaborative work.</p> <p>Thank you.</p>